

Charles E. Simpson
212.237.1070
csimpson@windelsmarx.com

156 West 56th Street | New York, NY 10019
T. 212.237.1000 | F. 212.262.1215

January 10, 2019

VIA CM/ECF

Honorable Alan S. Trust,
United States Bankruptcy Judge
United States Bankruptcy Court,
Eastern District of New York
Alfonse M. D'Amato Federal Courthouse
290 Federal Plaza, Courtroom 960
Central Islip, New York 11222

**Re: In re Orion HealthCorp, Inc., et al., Chapter 11
Case No. 18-71748 (AST)/Orion Healthcorp, Inc., et al. v.
Parmar Singh Parma (aka Paul Parmar), et al.,
Adv. Pro. No. 18-08053 (AST)**

Dear Judge Trust:

Please be advised that Windels Marx Lane & Mittendorf, LLP and the undersigned are the attorneys for creditors, Parmjit Singh Parmar ("Parmar") and those entities managed and/or controlled by Parmar in the above-referenced Chapter 11 case (the "Parmar Entities"), and Defendants and Cross-claimants in the above-referenced Adversary Proceeding pending before Your Honor.

As Your Honor may recall, a Motion to Dismiss Cross-claims ("CC MTD") in the above-referenced Adversary Proceeding was filed with the Bankruptcy Court on behalf of Cross-claim Defendants, CC Capital CHT Holdco LLC and CHT Holdco, LLC (jointly "CC Holdco"), by their attorneys Troutman Sanders LLP and Brett Goodman, Esq. ("Goodman"). On October 17, 2018 the Bankruptcy Court held a hearing and converted the CC MTD to a Motion for Summary Judgment and directed the "Parmar Parties" to file a supplemental cross-claim, etc.

Subsequently, at the hearing held by this Court on December 19, 2018, the undersigned advised the Court that Parmar could not comply with this Court's directions as to filing the required affidavit, citation to "admissible testimony" supported by "documentary evidence", etc., as to comply would result in the waiver by Parmar of his Fifth Amendment privileges in the criminal proceedings against him pending in the U.S. District Court for the District of New Jersey before Honorable Madeliene Cox Arleo, United States District Court Judge. As Your Honor may also recall, the parties were directed to confer and determine whether an agreement could be reached on a Stipulation which would dismiss, sever or otherwise dispose of the Cross-claims before the Court.

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In furtherance of Your Honor's direction, Mr. Goodman and the undersigned engaged in a number of telephone conversations, among ourselves and with our respective clients, in a good faith attempt to agree upon terms of a Stipulation that would dispose of the Cross-claims pending before this Court. Unfortunately, and by this letter, I advise the Court that despite good faith attempts on both sides, we have not been able to reach an agreement.

As a result of the above, the parties have agreed that Windels Marx, on behalf of Parmar and the Parmar Entities, shall file a Motion to Dismiss, Sever or otherwise Dispose of the Cross-claims (the "Motion to Dismiss") with the Court on January 11, 2019. Thereafter, Troutman Sanders LLC, on behalf of CC Holdco shall have until February 11, 2019 to file any written objections to the Motion; the Parmar Parties shall then have until February 22, 2019 to file any written Reply. In accordance with this Court's Procedures, we shall Docket the Motion on January 11, 2019 and have selected March 13, 2019 at 11:00 a.m. as the Hearing Date, unless the Court determines that the Motion to Dismiss shall be on submission.

Respectfully submitted,

Windels Marx Lane & Mittendorf, LLP

By: /s/ Charles E. Simpson
Charles E. Simpson
A Member of the Firm
*Attorneys for Parmjit Singh Parmar
And the Parmar Entities*

CES:mvr

cc: Brett Goodman, Esq.
Troutman Sanders LLP
875 Third Avenue
New York, NY 10022
*Attorneys for CC Capital CHT Holdco LLC
And CHT Holdco LLC*